EXHIBIT 12
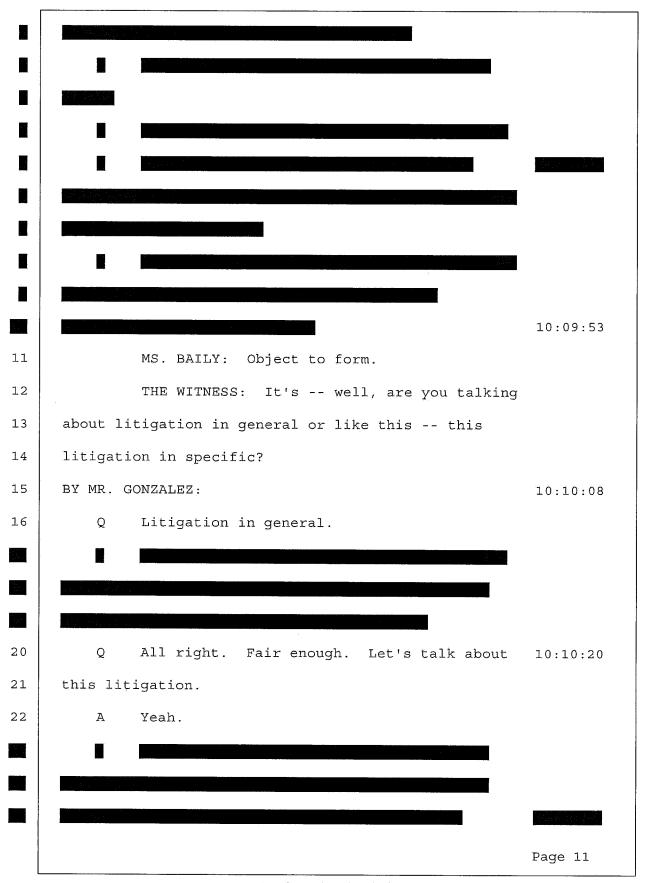
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 1              UNITED  STATES  DISTRICT  COURT

 2           NORTHERN  DISTRICT  OF  CALIFORNIA

 3              SAN  FRANCISCO  DIVISION

 4


   _____

 5   WAYMO LLC,                          )

 6               Plaintiff,              )

 7         vs.                           )   Case No.

 8   UBER TECHNOLOGIES, INC.,            )   3:17-cv-00939-WHA

 9   OTTOMOTTO LLC; OTTO                 )

10   TRUCKING LLC,                       )

11               Defendants.             )

                                         )
   _____

12

13       HIGHLY  CONFIDENTIAL  -  ATTORNEYS'  EYES  ONLY

14

15        VIDEOTAPED  DEPOSITION  OF  DANIEL  CHU

16             San  Francisco,  California

17             Monday,  April  3,  2017

18                  Volume  I

19

20

21   Reported  by:

22   SUZANNE  F.  GUDELJ,  CSR  No.  5111

23   Job  No.  2583707

24

25   PAGES  1  -  53
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 1            THE WITNESS:  So it's -- it's probably a --

 2   a growing -- growing list of folks, but the folks

 3   that we'd probably look at most are -- are Uber in

 4   terms of their self-driving efforts.  We also look

 5   at, for instance, Tesla in terms of some of their --   10:06:20

 6   their efforts there.

 7   BY MR. GONZALEZ:

 8        Q    Would you agree that your number one

 9   competitor in the market is Uber?

10            MS. BAILY:  Object to form.                     10:06:28

11            THE WITNESS:  I think it depends what

12   you --

16   BY MR. GONZALEZ:

17        Q    All right.  Let me focus on -- on your

18   words.  I'll use your words.

19

22        A    Sorry, say again?

23
                                                              10:06:59
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 5          MS. BAILY:  Object to form.              10:07:09

 6          THE WITNESS:

 8   BY MR. GONZALEZ:

 9      Q    Would you agree that it's your number one

10   competitor in that space?                        10:07:18

11          MS. BAILY:  Object to form.

12   BY MR. GONZALEZ:

13      Q    I'm not trying to trap you.

14      A    Yeah.

15      Q    If somebody else is number one, I want to  10:07:20

16   know, that's all.

17      A    Yeah.

18      Q    So let me go back.

19

                                                      10:07:26

21          MS. BAILY:  Same objection.

22          THE WITNESS:

24   BY MR. GONZALEZ:

25      Q    And who would you consider to be number   10:07:33
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1   basically my user research team does the surveys.

2   BY MR. GONZALEZ:

3   Q   And your research team is to have -- does

4   it have a name?

5   A   They -- they basically just called it the   10:08:38

6   user research group, yeah.

7   Q   User research group?

8   A   Yeah.

9   Q   Not Daniel's brigade or anything like that?

10   A   No.   10:08:49

11   Q   All right.   ██████████████████████

     ██ ███

     ██ ████████████

14   A   I don't remember the exact date.

15   Q   Approximately.   10:08:58

16   A   But approximately, we've done probably in

17   the last -- I'm trying to remember -- I mean, last

18   few months, but it's been more focused on the

19   markets that we're interested in, yeah.

20   Q   And what markets are those that you were   10:09:13

21   more focused on?

██   ██ █████████████████████████████████

██   ████████

██   ██ ████████████████████████████

██   ██   10:09:24

                                                Page 10

10:09:53

11   MS. BAILY: Object to form.

12   THE WITNESS: It's -- well, are you talking

13   about litigation in general or like this -- this

14   litigation in specific?

15   BY MR. GONZALEZ: 10:10:08

16   Q   Litigation in general.

20   Q   All right. Fair enough. Let's talk about   10:10:20

21   this litigation.

22   A   Yeah.

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1 ████████████████████████

2   MS. BAILY: Object to form.

3   THE WITNESS: ████████████████████

4 ██

5 ██████████████████████████ ██████ ████████

6 ████████████████████████████████

7 ██████████████████████████

8 BY MR. GONZALEZ:

9   Q   Do you ever have communications with public

10 agencies about your vehicles?   10:10:51

11   A   Do --

12   MS. BAILY: Object to form.

13   THE WITNESS: Do I personally or --

14 BY MR. GONZALEZ:

15   Q   Yes, you.   10:10:57

16   A   Most of my efforts are more internal

17 focused.

18   Q   Who at Waymo is the person who communicates

19 with public agencies to try to get approval for you

20 to be able to drive your autonomous vehicles there? 10:11:08

21   A   It's probably going to be more of our

22 public policy team and our partnership teams.

23   Q   And who are the people who are in charge of

24 those groups?

25   A   So -- I'm trying to think. So Kevin Vosen, 10:11:20

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1   San Francisco, if they were going to run through red

2   lights or whatnot, as -- and -- and that kind of

3   hurts other players, right. It hurts the perception

4   of the technology.

5   Q   Then the next page, page 12 of the   10:23:04

6   PowerPoint, it says:

████

████

9   And there's a subheading:

10

████

12   What does that mean?

13   A   What it means is if we look at the --████

████

████

████

████

████

████

████

████

████

23   And so this is referring to let's assume

24   they do that. How -- how can we make it so it's --

25   it's -- it's harder for them to do that.   10:24:02

                                                          Page 25

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 1   of billions of dollars?

 2           MS. BAILY:  Object to form.

 3           THE WITNESS:  You're saying in general or

 4   you're saying for particular like -- I just want to

 5   make sure I'm answering the question correctly.     10:40:59

 6   BY MR. GONZALEZ:

 7       Q    That's fair.

 8       A    Yeah.

 9   ██    █    ████████████████████████████

10       A    Okay.                                       10:41:04

11       Q    Would you agree that the ride-sharing

12   market for autonomous vehicles is likely to be in

13   the hundreds of billions of dollars?

14           MS. BAILY:  Object to form.

15           THE WITNESS:  I think it's -- it's          10:41:17

16   definitely possible that in the -- in the

17   ride-sharing market alone for self-driving cars on a

18   global basis that it will be in the hundreds of

19   billions of dollars, that's correct.

20   BY MR. GONZALEZ:                                     10:41:33

21       Q    Let me show you a document we've marked as

22   1033.

23           (Defendant Exhibit 1033 marked by the court

24           reporter.)

25   BY MR. GONZALEZ:                                     10:41:39
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